



Pathways Psychotherapy & Counselling

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Privacy Notice

This is the privacy notice of Samantha Elvyhart/Pathways Psychotherapy & Counselling. It contains information relevant to clients and to visitors to my website.

My practice address is The Clarendon Centre, Second Floor, 52-54 Regent St, Leamington Spa CV32 5EG.

In this document, 'I', 'my', or 'me' refers to Samantha Elvyhart t/a Pathways Psychotherapy & Counselling.

Introduction

1. This is a notice to inform you of my policy about all information that I record about you. It sets out the conditions under which I may process any information that I collect from you, or that you provide to me. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
 2. Website visitors: I regret that if there are one or more points below with which you are not happy, your only recourse is to leave my website immediately.
 3. I take the protection of your privacy and confidentiality seriously. I understand that all my clients and visitors to my website are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.
 4. I undertake to preserve the confidentiality of all information you provide to me.
 5. My policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
 6. The law requires me to tell you about your rights and my obligations to you with regards to the processing and control of your personal data. I do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org
 7. Except as set out below, I do not share, or sell, or disclose to a third party, any information collected through my website.
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The bases on which I process information about you

The law requires me to determine under which of six defined bases I process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which I process your personal information is no longer relevant then I shall immediately stop processing your data.

If the basis changes then if required by law I shall notify you of the change and of any new basis under which I have determined that I can continue to process your information.

1. Information I process because I have a contract with you

When you become my client, a contract is formed between you and I.

The service I provide to you as a client necessarily entails you providing me with personal information.

I process this information on the basis that there is a contract between us, or that you have requested I use the information before I enter into a legal contract with you.

I shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

2. Information I process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse my website or ask me to provide you with more information about my services, you provide your consent to me to process information that may be personal information.

Wherever possible, I aim to obtain your explicit consent to process this information.

Sometimes you might give your consent implicitly, such as when you write to me requesting a response.

Except where you have consented to my use of your information for a specific purpose, I do not use your information in any way that would identify you personally.

I continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by emailing me at hello@pathways-psychotherapy.co.uk If you do so, I shall no longer be able to provide my services to you.

3. Information I process for the purposes of legitimate interests

I may process information on the basis there is a legitimate interest, either to you or to me, of doing so.

Where I process your information on this basis, I do so after having carefully considered:

- Whether I could achieve the same objective by other means;
- Whether processing (or not processing) might cause you harm;
- Whether you would expect me to process your data, and whether you would, in the round, consider it reasonable to do so.

For example, I may process your data on this basis for the purposes of:

- Record-keeping for the proper and necessary administration of my business;
- Protecting and asserting your rights, my rights, or the rights of any other third party;
- Insuring against or obtaining professional advice that is required to manage business risk;
- Protecting your interests where I believe I have a duty to do so.

4. Information I process because I have a legal obligation

I am subject to the law like everyone else. Sometimes, I must process your information in order to comply with a statutory (legal) obligation. For example, I may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

Specific uses of information you provide to me

5. Information relating to your method of payment

Your debit or credit card number and other payment information is never taken by me or transferred to me either through my website or otherwise.

6. Contacting me

When you contact me, whether by telephone, by post, through my website or by e-mail, I collect the data you have given to me in order to reply with the information you need.

I record your request and my reply in order to increase the efficiency of my business.

I may keep personally identifiable information associated with your message, such as your name and email address so as to be able to track my communications with you to provide a high quality service.

If you inform me that you have decided not to take up my services, I immediately delete your contact information, and any other information I have about you.

7. Job application and employment

If you send me information in connection with a job application, I may keep it for up to three years in case I decide to contact you at a later date.

If I employ you, I collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, I will keep your file for six years before destroying or deleting it.

8. Complaining

When I receive a complaint, I record all the information you have given to me. I use that information to resolve your complaint.

If your complaint reasonably requires me to contact some other person, I may decide to give to that other person some of the information contained in your complaint. I do this as infrequently as possible, but it is a matter for my sole discretion as to whether I do give information, and if I do, what that information is.

I may also compile statistics showing information obtained from this source to assess the level of service I provide, but not in a way that could identify you or any other person.

If you complain about any of the content on my website or in any brochure, I shall investigate your complaint. If I feel it is justified or if I believe the law requires me to do so, I shall remove the content while I investigate.

If I think your complaint is vexatious or without any basis, I shall not correspond with you about it.

Use of information I collect through automated systems when you visit my website

9. Cookies

Out of necessity, my website uses cookies. They are placed by software that operates on my servers, and by software operated by third parties whose services I use.

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely. In general, the cookies which are initially placed on my website may be categorized as essential cookies.

When you first visit my website, I ask you whether you wish me to use cookies. If you choose not to accept them, I shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of my website.

I use a Wix website, which employs cookies in the following ways:

Cookie Name	Purpose	Duration	Cookie Type
XSRF-TOKEN	Used for security reasons	Session	Essential
hs	Used for security reasons	Session	Essential
svSession	Used in connection with user login	Session	Essential
SSR-caching	Used to indicate the system from which the site was rendered	1 minute	Essential
_wixCIDX	Used for system monitoring/debugging	3 months	Essential
_wix_browser_sess	Used for system monitoring/debugging	session	Essential
consent-policy	Used for cookie banner parameters	12 months	Essential

smSession	Used to identify logged in site members	Session	Essential
TS*	Used for security and anti-fraud reasons	Session	Essential
bSession	Used for system effectiveness measurement	30 minutes	Essential
fedops.logger.sessionId	Used for stability/effectiveness measurement	12 months	Essential
wixLanguage	Used on multilingual websites to save user language preference	12 months	Functional

Your web browser should allow you to delete any cookies you choose. It also should allow you to prevent or limit their use. The following links explain how to access cookie settings in various browsers:

- [Cookie settings in Firefox](#)
- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Google Chrome](#)
- [Cookie settings in Safari \(OS X\)](#)
- [Cookie settings in Safari \(iOS\)](#)
- [Cookie settings in Android](#)

To opt out of being tracked by Google Analytics across all websites, visit this link: <http://tools.google.com/dlpage/gaoptout>.

10. Personal identifiers from your browsing activity

Requests by your web browser to my servers for web pages and other content on my website are recorded.

I record information such as your geographical location, your Internet service provider and your IP address. I also record information about the software you are using to browse my website, such as the type of computer or device and the screen resolution.

I use this information in aggregate to assess the popularity of the webpages on my website and how I perform in providing content to you.

If combined with other information I know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to my website.

Disclosure and sharing of your information

11. Information I obtain from third parties

Although I do not disclose your personal information to any third party (except as set out in this notice), I sometimes receive data that is indirectly made up from your personal information from third parties whose services I use. No such information is personally identifiable to you.

Access to your own information

12. Access to your personal information

- 12.1. At any time you may review or update or request that I remove personally identifiable information that I hold about you. To obtain a copy of any information that is not provided on my website you may send me a request at hello@pathways-psychotherapy.co.uk.
- 12.2. After receiving the request, I will tell you when I expect to provide you with the information, and whether I require any fee for providing it to you.
- 12.3. When I receive any request to access, edit or delete personal identifiable information I shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.
- 12.4. Please be advised that in order to provide you with a psychotherapy service, I necessarily process information about you, such as your contact details (see previous section 'The bases on which I process information about you'). If you withdraw consent to my processing of this information, any contract between us must terminate.

Other matters

13. How you can complain about my privacy policy

- 13.1. If you are not happy with my privacy policy or if you have any complaint with respect to how I process your personal information then you should tell me by email. My address is hello@pathways-psychotherapy.co.uk.

- 13.2. If a dispute is not settled then I hope you will agree to attempt to resolve it by engaging in good faith with me in a process of mediation or arbitration.
- 13.3. If you are in any way dissatisfied about how I process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

14. Retention period for personal data

Except as otherwise mentioned in this privacy notice, I keep your personal information only for as long as required by me:

- 14.1. to provide you with the services you have requested;
- 14.2. to comply with other law, including for the period demanded by my tax authorities;
- 14.3. to support a claim or defence in court.

15. Compliance with the law

My privacy policy has been compiled so as to comply with the laws of the legal jurisdictions in the UK. If you think it fails to satisfy any of these laws, I should like to hear from you.

16. Review of this privacy policy

I may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on my website on the day you use my website. I advise you to print a copy for your records.

If you have any question regarding my privacy policy, please contact me at:

hello@pathways-psychotherapy.co.uk